

PARONICH LAW, P.C.

350 Lincoln Street, Suite 2400
Hingham, MA 02043

Anthony I. Paronich

Tel. (508) 221-1510
Fax (508) 318-8100
anthony@paronichlaw.com

Via Facsimile to (267) 299-7368

February 1, 2022

Hon. John M. Younger
U.S. Courthouse, Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

Re: Perrong v. Life Corporation, Civil Action No. 21-cv-2188, Joint Motion to
Extend Certain Deadlines

Judge Younger:

The parties are writing on this matter to request an extension of time pursuant to this Court's Policies and Procedures: General Matters Civil Cases, and Criminal Cases (available at: <https://www.paed.uscourts.gov/documents/procedures/youpol.pdf>).

In this putative class action alleging violations of the Telephone Consumer Protection Act, the Court entered a Scheduling Order on October 7, 2021 (ECF No. 15). The parties have been engaged in discovery since that date, including exchanging discovery responses and multiple document productions. The parties have also conferred and reached agreement about the format for electronic productions and ESI. Furthermore, the parties have also been engaged in meet and confer efforts and the Plaintiff has a pending motion to compel (ECF No. 22).

To allow for discovery to be completed following decisions regarding these motions, the parties propose the following schedule:

Event	Current Date	Proposed Date
Fact Discovery	February 4, 2022	May 5, 2022
Expert Discovery	March 18, 2022	June 16, 2022
Motions for Summary Judgment, Class Certification and Daubert Motions	April 8, 2022	July 7, 2022
Final Pretrial Conference	August 16, 2022 at 10:00 AM	November 14, 2022 at 10:00 AM

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The parties have agreed to an extension of time for Defendant's response to Plaintiff's Motion to Compel (ECF No. 22) by one week, through Friday, February 11, 2022. All other current deadlines would stay the same. Please contact our office if there are any questions.

Sincerely,

Dated: February 1, 2020

s/ Anthony I. Paronich

G. Clinton Kelley
304 Ross Street, 7th Floor
Pittsburgh, PA 15219
Telephone: (412) 454-5599
E-mail: gckesq@gmail.com

Anthony I. Paronich
Paronich Law, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(508) 221-1510
anthony@paronichlaw.com

Counsel for Plaintiff

Dated: February 1, 2020

s/ Ezra D. Church

Ezra D. Church, Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
Phone: (215) 963-5000
Fax: (215) 963-5001
ezra.church@morganlewis.com

Counsel for Defendant